



Association of California Water Agencies

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October 21, 2016

CalEnviroScreen
c/o Carolyn Flowers
Office of Environmental Health Hazard Assessment
P.O. Box 4010
Sacramento, CA 95812-4010

Re: ACWA's Comments regarding the Draft CalEnviroScreen 3.0 Drinking Water Indicator

Dear Ms. Flowers:

The Association of California Water Agencies ("ACWA") appreciates the opportunity to comment on the California Environmental Protection Agency's ("CalEPA") and the Office of Environmental Health Hazard Assessment's ("OEHHA") draft CalEnviroScreen 3.0 screening tool ("draft CES 3.0"). ACWA represents over 430 public water agencies that collectively supply 90% of the water delivered in California for domestic, agricultural, and industrial uses. Many of ACWA's public agency members are entrusted with the responsibility of supplying the public with safe, high-quality drinking water. Ensuring the safety of drinking water supplies by complying with all relevant state and federal standards is the highest priority of these agencies.

ACWA appreciates CalEPA and OEHHA's continued focus on carrying out their duties and responsibilities in a manner that protects and benefits all Californians. ACWA also appreciates CalEPA and OEHHA's consideration of ACWA's comment letter, dated June 2, 2014, regarding the draft CalEnviroScreen 2.0 screening tool ("CES 2.0"). CES 2.0 included a Drinking Water Indicator ("Indicator") for the first time. ACWA submitted detailed technical comments on June 2, 2014 and expressed concerns regarding the Indicator.

The draft CES 3.0 is primarily designed to assist CalEPA in carrying out its environmental justice mission. The Indicator is intended to reflect a statewide ranking of census tracts based on "a combination of contaminant data that takes into account the relative concentrations of different contaminants and whether multiple contaminants are present."¹ As noted in the draft Report, the drinking water contaminant index used in draft CES 3.0 is "not a measure of compliance with [drinking water] standards."² Additionally, in 2014, "approximately 97% of Californians using public [water] systems received water that met all federal and state drinking water standards."³ The Indicator "does not indicate whether water is safe to drink."⁴ ACWA supports the inclusion of this important information regarding the Drinking Water Indicator.

¹ CalEPA/OEHHA, DRAFT CALIFORNIA COMMUNITIES ENVIRONMENTAL HEALTH SCREENING TOOL, VERSION 3.0 (CALENVIROSCREEN 3.0) (Sept. 2016) ("Draft CES 3.0 Report"), at p. 38.

² *Ibid.*

³ *Ibid.*, citing State Water Resources Control Board, 2014 Annual Compliance Report (rev. Feb. 2016).

The draft CES 3.0 Drinking Water Indicator differs from the CES 2.0 Indicator in several instances. First, of the approximately 3,000 community water systems covered by the Indicator, 2,057 water system service area boundaries were used in draft CES 3.0., about 700 more service area boundaries than were available in CES 2.0.⁵ Second, the Indicator includes three new contaminants: tetrachloroethylene (PCE), 1,2,3-trichloropropane (TCP), and combined radium 226 and 228.⁶ Third, water contaminant data from 2005-2013 was incorporated into the indicator.⁷

ACWA urges CalEPA and OEHHA to publicly release a technical memorandum and other supplemental information and documentation that support the methodology and findings of the draft CES 3.0 Drinking Water Indicator. Making additional information and documentation available to the public will help ACWA and other water community stakeholders interpret the usefulness of the Indicator. As the CES 3.0 is finalized, ACWA encourages CalEPA and OEHHA to include elements that are responsive to the following considerations:

- 1. Water system service area boundaries:** The draft CES 3.0 notes that 3,000 community water systems are covered by the Indicator, but only 2,057 service area boundaries were used.⁸ The draft CES 3.0 does not state which service area boundaries were chosen and why. Additionally, the draft CES 3.0 notes that “where necessary, the boundaries [of drinking water systems] were approximated.”⁹ The draft CES 3.0 does not explain the methodology that was used to approximate such boundaries.
- 2. Water contaminant data:** The Indicator uses water contaminant data from 2005-2013 and notes that average concentrations from this one time period “may not be representative of current concentrations in treated drinking water.”¹⁰ These averages could be higher than current concentrations in systems’ drinking water and thus may not be accurate for purposes of calculating the Indicator. More recent data may be more representative of current water quality.
- 3. Changes in reporting levels:** The Indicator does not explain how changes in the reporting levels of contaminants would be incorporated into the CalEnviroScreen screening tool.
- 4. Incorporation of imported water quality data:** Many water agencies rely on imported surface water as an important source of supply for drinking water systems. It is unclear how the imported supplies for these agencies are accounted within the Indicator’s census tracts.

⁴ Draft CES 3.0 Report, at p. 38.

⁵ CalEPA/OEHHA, PROPOSED CHANGES IN THIS CALENVIROSCREEN 3.0 UPDATE (Sept. 2016), at p. 3.

⁶ *Ibid.*

⁷ *Ibid.*

⁸ *Ibid.*

⁹ Draft CES 3.0 Report, at p. 40.

¹⁰ *Id.*, at p. 38.

ACWA appreciates CalEPA and OEHHA's continued focus on carrying out their duties and responsibilities in pursuit of their environmental justice mission in a manner that protects and benefits all Californians. ACWA encourages CalEPA and OEHHA to carefully consider the above-mentioned concerns and to proactively engage water agencies and other stakeholders to improve the draft CES 3.0 Drinking Water Indicator. We look forward to continuing to work with CalEPA and OEHHA on the CalEnviroScreen screening tool.

If you have any questions regarding this matter, please contact me at AdamB@acwa.com or (916) 441-4545.

Sincerely,

A handwritten signature in black ink that reads "Adam Borchard". The signature is written in a cursive, flowing style.

Adam Borchard
State Relations Analyst

cc: Mr. Arsenio Mataka, CalEPA
Dr. John Faust, OEHHA
Mr. Dave Bolland
Mr. Adam W. Robin